

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:18-CV-68
)	
UNITED STATES OF AMERICA, <i>et al.</i> ,)	
)	
Defendants,)	
)	
KARLA PEREZ, <i>et al.</i> ,)	
)	
Defendant-Intervenors,)	
and)	
)	
STATE OF NEW JERSEY,)	
)	
Defendant-Intervenor.)	
)	

DEFENDANT-INTERVENORS' UNOPPOSED MOTION TO EXCEED PAGE LIMITS

Defendant-Intervenor State of New Jersey (“New Jersey”) respectfully requests that the Court grant it permission to exceed the 20-page limit for memoranda of law by 29 pages for its “Post-Discovery” Memorandum of Law in Opposition to Plaintiffs’ Motion for Preliminary Injunction. Plaintiffs made a similar Motion To File Excess Pages, which was granted (*see* Dkt. 4, 9), and on May 4, 2018 Plaintiffs filed a 49 page opening Memorandum in support of their Motion for Preliminary Injunction. (*See* Dkt. 5.) New Jersey’s Memorandum of Law in Opposition will address complex issues in a case of national importance, and New Jersey requires these extra pages to adequately present these issues to the Court for adjudication. New Jersey seeks this extension for good cause and in the interest of justice, and no party will be prejudiced if the motion is granted.

Counsel for the Plaintiffs, Federal Defendants, and the Perez Defendant-Intervenors have each indicated that they do not oppose this request.

CONCLUSION

New Jersey respectfully requests that the Court grant this Motion to Exceed Page Limits.

Dated: July 17, 2018

GURBIR S. GREWAL
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CERTIFICATE OF CONFERENCE

I certify that on July 12 and 13, 2018, counsel for the parties conferred regarding the relief requested in this motion and counsel for Plaintiffs, the Federal Defendants, and the Perez Defendant-Intervenors each indicated that they do not oppose this motion.

/s/Rachel Wainer Apter
Rachel Wainer Apter

CERTIFICATE OF SERVICE

I certify that on July 17, 2018, I caused this document (and exhibits hereto) to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/Rachel Wainer Apter
Rachel Wainer Apter

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Defendant-Intervenor.)	

[PROPOSED] ORDER

Defendant-Intervenor State of New Jersey’s Unopposed Motion to Exceed Page Limits (the “Motion”) having come before this Court, and the Court having considered the papers submitted in connection with said motion, and for good cause shown, IT IS HEREBY ORDERED that:

- (1) The Motion is GRANTED; and
- (2) Defendant-Intervenor State of New Jersey shall be permitted to file a “Post-Discovery” Memorandum of Law in Opposition to Plaintiffs’ Motion for Preliminary Injunction of up to 49 pages.

IT IS SO ORDERED on this _____ day of July, 2018.

Hon. Andrew S. Hanen
United States District Court Judge